

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Lead Case]

LULAC PLAINTIFFS' THIRD AMENDED PRETRIAL DISCLOSURES

Plaintiffs LULAC, et al., (“LULAC Plaintiffs”) hereby submit the following Third Amended Pretrial Disclosures pursuant to Federal Rule of Civil Procedure 26(e). LULAC Plaintiffs reserve the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants' Pretrial Disclosures, as appropriate.

I. WITNESSES

LULAC Plaintiffs’ Witness List is set forth in **Exhibit A** attached hereto. LULAC Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial. Accordingly, LULAC Plaintiffs reserve the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call its witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on Defendants’ witness list and any witness necessary to rebut Defendants’ case, arguments, and/or evidence, and/or to authenticate or

lay the foundation for the introduction of documents to which Defendant objects; (4) reasonably supplement or amend this Witness List through and including the time of trial to the extent permitted by the Court; (5) introduce deposition testimony as impeachment evidence; or (6) change a witness from a live witness to a witness testifying by deposition, and vice versa. LULAC Plaintiffs also reserve the right to supplement or modify this witness list in response to rulings made by the Court. LULAC Plaintiffs' identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants.¹

II. TRIAL EXHIBITS

LULAC Plaintiffs' Preliminary Trial Exhibit List is set forth in **Exhibit B** attached hereto. LULAC Plaintiffs reserve the right to introduce in evidence any documents identified by Defendants or any other plaintiff in their pre-trial disclosures and to introduce additional documents as rebuttal or impeachment evidence. LULAC Plaintiffs also reserve the right to introduce in evidence any exhibits that are offered as joint exhibits but regarding which the parties do not reach agreement.

LULAC Plaintiffs' list of trial exhibits does not include demonstrative exhibits, which will be identified and exchanged at a mutually agreeable time prior to trial. LULAC Plaintiffs will serve their objections to Defendants' trial exhibit list and any additional trial exhibits in accordance with the Court's Pretrial Scheduling Order.

¹ Pursuant to the parties' agreement, the parties will exchange deposition designations as required under Federal Rule of Civil Procedure 26(a)(3) for any witnesses testifying by deposition on May 7, 2025.

Date: May 17, 2025

Respectfully submitted,

/s/ Nina Perales

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Counsel for LULAC Plaintiffs

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 17th day of May 2025.

/s/ Nina Perales

Nina Perales

EXHIBIT A

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LULAC PLAINTIFFS' WITNESS LIST

LULAC Plaintiffs identify the following live witnesses in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(i):

WITNESS	[E]XPERT WITNESS [L]AY WITNESS	MAY CALL	WILL CALL
State Representative Ana Maria Ramos Capitol Room E2.312, P.O. Box 2910, Austin, TX 78768 (512) 463-0454	L	X	
Dr. Andrés Tijerina Dr. Tijerina may be contacted through LULAC Plaintiffs' undersigned counsel.	E		X
Angelica Razo Ms. Razo may be contacted through LULAC Plaintiffs' undersigned counsel.	L		X
State Representative Armando Walle Representative Walle may be contacted through counsel, Joaquin Gonzalez, Mexican	L		X

WITNESS	[E]XPERT WITNESS [L]AY WITNESS	MAY CALL	WILL CALL
American Legislative Caucus, 1108 Lavaca Street, Suite 110- 351 Austin, TX 78701. (512) 463-0740			
Art Fierro Art Fierro may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L	X	
Dr. Bernard L. Fraga Dr. Fraga may be contacted through LULAC Plaintiffs’ undersigned counsel.	E		X
Bobbie Garza Hernandez Ms. Garza Hernandez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L	X	
Candace Valenzuela 3925 St. Christopher Lane, Dallas, TX 75287 (915) 637-9617	L		X
State Representative Cassandra Garcia Hernandez Representative Garcia Hernandez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L	X	
Cesar Espinosa Mr. Espinosa may be contacted through LULAC Plaintiffs’ undersigned counsel.	L		X
State Representative Chris Turner 320 Westway Place, Suite 501, Arlington, TX 7601	L	X	
State Representative Claudia Ordaz Perez Capitol Room E2.802, P.O. Box 2910, Austin, TX 78768 (512) 463-0622	L		X
State Representative Christina Morales Capitol Room E2.404, P.O. Box 2910, Austin, TX 78768	L		X

WITNESS	[E]XPERT WITNESS [L]AY WITNESS	MAY CALL	WILL CALL
(512) 463-0732			
Diana Martinez Alexander Ms. Alexander may be contacted through LULAC Plaintiffs' undersigned counsel.	L		X
Domingo Garcia Mr. Garcia may be contacted through LULAC Plaintiffs' undersigned counsel.	L		X
State Representative Eddie Morales Capitol Room E2.816, P.O. Box 2910, Austin, TX 78768 (512) 463-0566	L	X	
State Representative Gene Wu Representative Wu may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L	X	
Ina Minjarez Ina Minjarez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L		X
Jeanette Martinez 3928 Townsend Dr. Fort Worth, Texas 76110 817-714-5771	L	X	
JoAnn Acevedo Ms. Acevedo may be contacted through LULAC Plaintiffs' undersigned counsel.	L		X
State Representative Joe Moody Representative Moody may be contacted through counsel, Joaquin Gonzalez, Mexican American Legislative Caucus, 1108 Lavaca Street, Suite 110-351 Austin, TX 78701. (512) 463-0740.	L		X
Joey Cardenas Mr. Cardenas may be contacted through LULAC Plaintiffs' undersigned counsel.	L		X

WITNESS	[E]XPERT WITNESS [L]AY WITNESS	MAY CALL	WILL CALL
Kristian Carranza 1327 Mission Grande Apt. 6, San Antonio, TX 78221. 210-551-1313.	L		X
Leo Pacheco 639 Kopplow Pl., San Antonio, TX 78221 (210) 771-2301	L		X
State Representative Lina Ortega Capitol Room E2.204, P.O. Box 2910, Austin, TX 78768. (512) 463-0638.	L	X	
Maida Guillen 2618 Strait Lane, Houston, TX (512) 791-9317	L	X	
State Representative Mary Ann Perez Representative Perez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L	X	
State Representative Mary Gonzalez Representative Gonzalez may be contacted through counsel, Joaquin Gonzalez, Mexican American Legislative Caucus, 1108 Lavaca Street, Suite 110-351 Austin, TX 78701. (512) 463-0740	L	X	
Dr. Matt Barreto Dr. Barreto may be contacted through Chad Dunn, counsel for Brooks Plaintiffs.	E		X
State Representative Nicole Collier 101 S. Jennings Suite 103A, Fort Worth, Texas 76104	L	X	
Norma Cavazos Ms. Cavazos may be contacted through Chad Dunn, counsel for Brooks Plaintiffs.	L	X	

WITNESS	[E]XPERT WITNESS [L]AY WITNESS	MAY CALL	WILL CALL
State Representative Penny Morales Shaw Capitol Room E1.416, P.O. Box 2910, Austin, TX 78768 (512) 463-0620	L		X
State Representative Rafael Anchia 1111 West Mockingbird Lane, Suite 1010, Dallas, TX 75247.	L		X
State Representative Ramon Romero Capitol Room E2.322, P.O. Box 2910, Austin, TX 78768 (512) 463-0740	L		X
Dr. Rogelio Sáenz Dr. Saenz may be contacted through LULAC Plaintiffs' undersigned counsel.	E		X
Salvador Espino Mr. Espino may be contacted through LULAC Plaintiffs' undersigned counsel.	L		X
Dr. Stephen Ansolabehere Dr. Ansolabehere may be contacted through David Fox, counsel for Gonzales Plaintiffs.	E		X
Dr. Tye Rush Dr. Rush may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	E		X
Vincent Perez Mr. Perez may be contacted through Sean McCaffity, counsel for MALC Plaintiffs.	L	X	

LULAC Plaintiffs identify the following witnesses whose testimony will be presented through deposition in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(ii). Transcripts

of the pertinent portions of each witness' deposition will be filed in accordance with the Court's order granting the parties' Joint Motion to Extend Deadline to Exchange Deposition Designations.²

WITNESS	WILL PRESENT THROUGH DEPOSITION
Jeffrey Archer	X
Mark Bell	X
State Senator Paul Bettencourt	X
State Senator Brian Birdwell	X
State Representative Bradley Buckley	X
Sharon Carter	X
Adam Foltz	X
Colleen Garcia	X
Chris Gober	X
State Representative Ryan Guillen	X
State Senator Kelly Hancock	X
Dan Huberty	X
Willie Hudspeth	X
Representative Todd Hunter	X
U.S. Representative Sheila Jackson Lee	X
June Jenkins	X
Jacey Jetton	X
Adam Kincaid, in individual capacity	X
Adam Kincaid, as representative of NRRT	X
State Representative JM Lozano	X
State Representative John Lujan	X
Anna Mackin	X
Jessica Mejia	X
Andrew Murr	X
Sean Opperman	X
Hugh Shine	X
State Representative Chris Turner	X
Harold Vanarsdale	X
Milton Lee	X

² See Text Order Granting ECF No. 923, Motion to Extend Scheduling Order Deadlines. May 2, 2025.

EXHIBIT B

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LULAC PLAINTIFFS' EXHIBIT LIST

LULAC PLAINTIFFS' EXHIBIT NO.	DESCRIPTION
PL_LULAC 1	Expert Report of Dr. Bernard Fraga, dated March 31, 2025
PL_LULAC 2	Supplemental Expert Report on the Socioeconomic Characteristics of the Latino Population in Texas of Dr. Rogelio Saenz, dated March 31, 2025
PL_LULAC 3	Expert Report on the Socioeconomic Characteristics of the Latino Population in Texas of Dr. Rogelio Saenz, dated May 20, 2022
PL_LULAC 4	Expert Report of Dr. Andrés Tijerina, dated May 20, 2022
PL_LULAC 5	Texas Demographic Center, Demographic Trends and Characteristics: Texas and the Hispanic Population, August 29, 2023

PL_LULAC 6	[FORTHCOMING Bexar County Elections, Precinct Results, HD118, 2018 General Election]
PL_LULAC 7	Bexar County Elections, Precinct Results, HD118, 2020 General Election
PL_LULAC 8	Bexar County Elections, Precinct Results, HD118, November 2, 2021 Runoff Election
PL_LULAC 9	Bexar County Elections, Precinct Results, HD118, 2022 General Election
PL_LULAC 10	Bexar County Elections, Precinct Results, HD118, 2024 General Election
PL_LULAC 11	[FORTHCOMING Demonstrative Map, Precinct Results, HD118, 2018 General Election]
PL_LULAC 12	Demonstrative Map, Precinct Results, HD118, 2020 General Election
PL_LULAC 13	Demonstrative Map, Precinct Results, HD118, November 2, 2021 Runoff Election
PL_LULAC 14	[FORTHCOMING Demonstrative Map, Precinct Results, HD118, 2022 General Election]
PL_LULAC 15	[FORTHCOMING Demonstrative Map, Precinct Results, HD118, 2024 General Election]
PL_LULAC 16	[FORTHCOMING TLC, Precinct SSTD, HD118, 2018 General Election]
PL_LULAC 17	[FORTHCOMING TLC, Precinct SSTD, HD118, 2020 General Election]

PL_LULAC 18	[FORTHCOMING TLC, Precinct SСТО, HD118, November 2, 2021 Runoff Election]
PL_LULAC 19	[FORTHCOMING TLC, Precinct SСТО, HD118, 2022 General Election]
PL_LULAC 20	[FORTHCOMING TLC, Precinct SСТО, HD118, 2024 General Election]
PL_LULAC 21	[FORTHCOMING Demonstrative Map, Precinct SСТО, HD118, 2018 General Election]
PL_LULAC 22	[FORTHCOMING Demonstrative Map, Precinct SСТО, HD118, 2020 General Election]
PL_LULAC 23	[FORTHCOMING Demonstrative Map, Precinct SСТО, HD118, November 2, 2021 Runoff Election]
PL_LULAC 24	[FORTHCOMING Demonstrative Map, Precinct SСТО, HD118, 2022 General Election]
PL_LULAC 25	[FORTHCOMING Demonstrative Map, Precinct SСТО, HD118, 2024 General Election]
PL_LULAC 26	Map, Bexar County Independent School Districts
PL_LULAC 27	Demonstrative Map, Bexar County House districts in H2100 and H2316
PL_LULAC 28	Demonstrative Map, State House District 118 in H2100 and H2316
PL_LULAC 29	City of Houston, Super Neighborhoods Map
PL_LULAC 30	John Lujan Deposition Exhibits 2-20

PL_LULAC 31	Brooks Landgraf Deposition Exhibits 2, 4, 16-17, 22-23
PL_LULAC_32	Map, Original Tom Green County, 1874
PL_LULAC_33 [OR PL_BROOKS_226]	Expert Report of Dr. Tye Rush, dated March 31, 2025
PL_LULAC_34 [OR PL_BROOKS_227]	Dr. Tye Rush CV
PL_LULAC 35	Texas HD118 In-and-Out Map
PL_LULAC 36	U.S. Census County Population Change 2010 to 2020, Select Counties
PL_LULAC 37	Texas Demographic Center, Redistricting Data for Texas Counties 2000-2020
PL_LULAC 38	Demonstrative Exhibit – WTX State House Population Deviations in H2316
PL_LULAC 39	10.11.21 Letter: Bexar County Delegation of Support for H2230 by State House Representative Bernal
PL_LULAC 40	Standing Declaration of Plaintiff David Lopez
PL_LULAC 41	FILED UNDER SEAL – Associational Standing Organization Membership Chart
PL_LULAC 42	FILED UNDER SEAL – Standing Declaration of LULAC Member F
PL_LULAC 43	FILED UNDER SEAL – Standing Declaration of LULAC Member G

PL_LULAC 44	FILED UNDER SEAL – Standing Declaration of LULAC Member H
PL_LULAC 45	FILED UNDER SEAL – Standing Declaration of LULAC Member I
PL_LULAC 46	FILED UNDER SEAL – Standing Declaration of LULAC Member J
PL_LULAC 47	FILED UNDER SEAL – Standing Declaration of LULAC Member K
PL_LULAC 48	FILED UNDER SEAL – Standing Declaration of LULAC Member N
PL_LULAC 49	FILED UNDER SEAL – Standing Declaration of LULAC Member O
PL_LULAC 50	FILED UNDER SEAL – Standing Declaration of MABA Member A
PL_LULAC 51	FILED UNDER SEAL – Standing Declaration of MABA Member B
PL_LULAC 52	FILED UNDER SEAL – Standing Declaration of MABA Member D
PL_LULAC 53	FILED UNDER SEAL – Standing Declaration of TX HOPE Member A
PL_LULAC 54	FILED UNDER SEAL – Standing Declaration of TX HOPE Member B
PL_LULAC 55	FILED UNDER SEAL – Standing Declaration of TALAS Member A

PL_LULAC 56	FILED UNDER SEAL – Standing Declaration of RITA Member A
PL_LULAC 57	FILED UNDER SEAL – Standing Declaration of RITA Member B
PL_LULAC 58	FILED UNDER SEAL – Standing Declaration of RITA Member C
PL_LULAC 59	FILED UNDER SEAL – Standing Declaration of RITA Member D
PL_LULAC 60	Letter from Ralph Boyd, U.S. Assistant Attorney General, to Geoffrey Connor, Acting Secretary of State, dated November 16, 2021
PL_LULAC 61	Brady, Texas, park sign, dated 1930
PL_LULAC 62	Lanier High School Photo, dated 1947
PL_LULAC 63	Austin History Center, Austin Projects Photos
PL_LULAC 64	Hidalgo County Pass, dated October 5, 1915
PL_LULAC 65	Photo, Mexican shanties near Dump
PL_LULAC 66	Photo, Mexican children
PL_LULAC 67	Photo, Lyndon Johnson with his class at the “Mexican” school
PL_LULAC 68	Map, City of San Antonio Registered Neighborhood Associations, dated March 21, 2025

PL_LULAC 69	Texas Legislative Council Map, Texas House Districts 82 nd Legislative Session with Deviation from 2010 Ideal District Population, dated February 17, 2011
PL_LULAC 70	Texas Legislative Council RED-710 Report, County Population, Voter Registration, and Turnout Analysis for All Counties, 2014 General Election, dated March 17, 2025
PL_LULAC 71	Texas Legislative Council RED-710 Report, County Population, Voter Registration, and Turnout Analysis for All Counties, 2016 General Election, dated March 17, 2025
PL_LULAC 72	Texas Legislative Council RED-710 Report, County Population, Voter Registration, and Turnout Analysis for All Counties, 2018 General Election, dated March 17, 2025
PL_LULAC 73	Texas Legislative Council RED-710 Report, County Population, Voter Registration, and Turnout Analysis for All Counties, 2020 General Election, dated March 17, 2025
PL_LULAC 74	Texas Legislative Council RED-710 Report, County Population, Voter Registration, and Turnout Analysis for All Counties, 2022 General Election, dated March 17, 2025
PL_LULAC 75	Texas Legislative Council RED-710 Report, County Population, Voter Registration, and Turnout Analysis for All Counties, 2024 General Election, dated March 17, 2025
PL_LULAC 76	Texas Legislative Council RED-100 Report, District Population Analysis with County Subtotals, House Districts – Plan H414, dated June 13, 2019
PL_LULAC 77	Texas Legislative Council RED-100 Report, District Population Analysis with County Subtotals, House Districts – Plan H100, dated February 22, 2011